

Holcim (US) Inc. 1260 Security Rd Hagerstown, MD 21742 Phone301 739 1150 Fax 301 739 6708 www.holcim.com/us

February 26, 2010

Edward Dexter
Land Management Administration
Solid Waste Program
1800 Washington Boulevard • Suite 605
Baltimore, Maryland 21230-1719

Solid waste From Solid

Dear Mr. Dexter:

Enclosed is the report of the ash content of coal for 2009. A cement plant does not produce residue from the combustion of coal but MDE has indicated a report of the ash content of coal must be submitted. This report contains information that Holcim (US) considers **Confidential Commercial/Business Information and Trade Secrets** as those terms are used in the Maryland Public Information Act, MDE regulations, and the Maryland Uniform Trade Secrets Protection Act. This information is not publicly available as it could allow a competitor to forecast Holcim's competitive position by determining cost structures and in turn impact Holcim's ability to meet market challenges.

Please also note that we recently discovered that confidential commercial information from our 2008 report was incorporated into a table on your website. While we certainly do not authorize you to disclose such information it is worth noting that it was also wrongly characterized as fly ash. We respectfully request that the material designated to Holcim be removed from that table as well as from future documents prepared by the MDE for public distribution.

Sincerely,

Victoria M. Mock `Environmental Manager

# MARYLAND DEPARTMENT OF THE ENVIRONMENT 1800 Washington Boulevard • Suite 605 • Baltimore, Maryland 21230-1719 (410) 537-3000 • 800-633-6101 x3318 • <a href="https://www.mde.state.md.us">www.mde.state.md.us</a>

		Waste Mana	agement Admir	istration • Solid	Waste Management Administration • Solid Waste Program		O'D'	L. Manifest
Coal Combustion Byproducts		(CCB) 2008	800					
Generation, Uses, and Disposition* *NOTE: All CCBs Shown Were Produced By Maryland Generators	nd Dispo ced By Mary	Sition* and Generator			CCB Tons 2.5	2		
Total CCBs Generated In Maryland	land	Tons				2 //		
Total CCBs Generated (All Types) Total CCBs Generated (Fix Ash)	2,0,1	2,043,061			<b>~</b>	1.5 -//		
Total CCBs Generated (Bottom Ash)	26	268,591						
Total CCBs Generated (Boiler Slag)	4	47,661			-			
Total CCBs Disposed in Maryland	50	503,917			<b>.</b>			
Total CCBs Transported Out of State	8	330,568				3	A 40	30.00
Total CCBs Used Beneficially		745,057				- E	SAN OF THE PERSON NAMED IN COLUMN TWO IS NOT THE PERSON NAMED IN COLUM	W.P.O. 60
Total CCBs Used in Coal Mine Reclamation	4 •	463,519		,		1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1	10 10 10 10 10 10 10 10 10 10 10 10 10 1	\$ •05.
		Jetall of Total CCBs by Generator	al CCBs r	V Generat	ō	ر ا ا	& 0 %	**
				Total Lone	Total Tons	Total Tons	Total Tons	Total Tons
	Tons of CC	Tons of CCBs Generated by Category	oy Category	Generated	Maryland	Reclamation	Beneficially	Out of State
Generator	Fly Ash	Bottom Ash	Boiler Slag					
AES Warrior Run, LLC	275.814	94.484	7 735	378 033		47K 033		
Ailegany County Public Schools		260	1	260		260		
Atlegheny Energy Supply Company, LLC	28,665	7,166		35.831				35,831
Constellation Power Generation	624,321	30,071	39,926	694,318	10,031		395,135	289,152
Holcim (US), Inc.	25,938		•	25,938			25,938	
L. Gregory & Sons, Inc.		8		7	2		•	
Lahigh Cement Company	84,829			84,829			84,829	
Mettiki Coal, LLC	1,866			1,866	1,866			
Mirant Mid-Atlantic, LLC	615,000	116,000		731,000	492,000		239,000	
Moran Coal Company, Inc.	64,772	20,454		85,226		85.226		
Mt. Saint Mary's College	•	151		155			155	
Naval Support Activity, Indian Head	5,585			5,585				5,585
Stan's Auto Body	•			18	18			
Total Tons Generated by Category—▶	1,726,809	268,591	47,661					
Total Tons by Final Disposition					503,917	463,519	745,057	330,568
Total Tons CCBs Gar		erated in Maryland	prepo	2 na 2 na 3	•		•	•

Total Tons CCBs Generated In Maryland —— 2,043,061

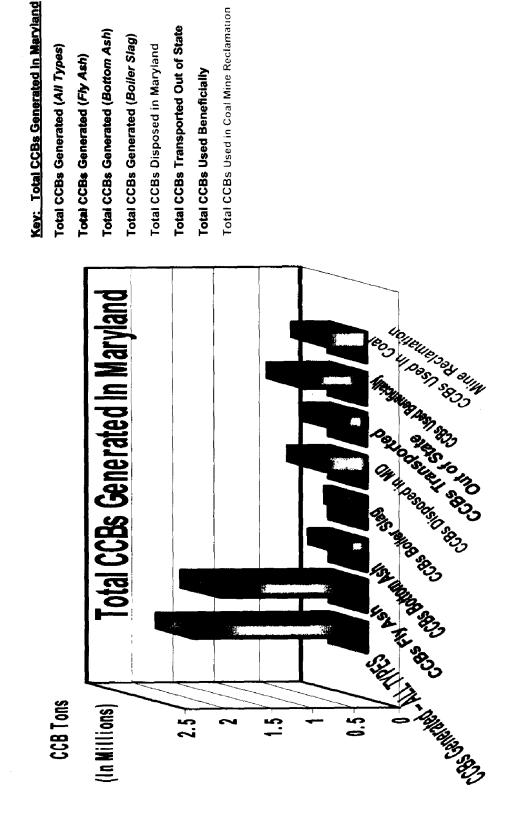
Date: June 23, 2009 TTY Users: 800-735-2258

# 2008 Coal Combustion Byproducts (CCBs) -- Generation, Uses, and Disposition

\*NOTE: All CCBs Shown Were Produced By Maryland Generators

**268,591 47,661**503,917 **330,568 745,057**463,519

2,043,061



# Confidential Commercial/Business Information and Trade Secrets DEPARTMENT OF THE ENVIRONMENT

Land Management Administration • Solid Waste Program
1800 Washington Boulevard • Suite 605 • Baltimore, Maryland 21230-1719
410-537-3375 • 800-633-6101 x3375 • www.mde.state.md.us

# Coal Combustion Byproducts (CCB) Annual Generator Tonnage Report

### Instructions for Calendar Year 2009

The following is general information relating to the requirement for reporting quantities of coal combustion byproducts that were managed in the State of Maryland during calendar year 2009. Please answer the questions on the form provided, attaching additional information and any requested supplemental information to the back of the form.

I. Background. This requirement that generators of coal combustion byproducts (CCBs) submit an annual report was instituted in the Code of Maryland Regulations COMAR 26.04.10.08, that was promulgated effective December 1, 2008. The regulation requires that any non-residential generator of CCBs submit a report to the Department by March 1 of each year describing the manner in which CCBs generated within the State were managed during the preceding calendar year. Additional information and specific instructions follow. For more detailed information, please refer to COMAR 26.04.10.08.

## II. General Information and Applicability.

A. Definitions. Coal combustion byproducts are defined in COMAR 26.04.10.02B as:

- "(3) Coal Combustion Byproducts. (a) "Coal combustion byproducts" means the residue generated by or resulting from the burning of coal.
- (b) "Coal combustion byproducts" includes fly ash, bottom ash, boiler slag, pozzolan, and other solid residuals removed by air pollution control devices from the flue gas and combustion chambers of coal burning furnaces and boilers, including flue gas desulfurization sludge and other solid residuals recovered from flue gas by wet or dry methods. "

A generator of CCBs is defined in COMAR 26.04.10.02B as:

- "(9) Generator.
- (a) "Generator" means a person whose operations, activities, processes, or actions create coal combustion byproducts.
- (b) "Generator" does not include a person who only generates coal combustion byproducts by burning coal at a private residence."

B. Applicability. If you or your company meet the definition of a generator of CCBs as defined above, you must provide the information as required below. For the purposes of this report, "you" shall hereinafter refer to the generator defined above. Please note that COMAR

Form Number: MDE/WAS/PER.033 Date: February 3, 2010 TTY Users: 800-735-2258

Confidential Commercial/Business I Facility Name:Holcim (US)		ort – 2009
26.04.10.08 requires generators of concerning the disposition of the CCB	CCBs to submit an annual report	t to the Department
III. Required Information. The followarch 1, 2010:	owing information must be provided	to the Department by
A. Contact information:		
Facility Name: Holcim (US) Inc.		
Name of Permit Holder: Holcim (US)	Inc.	
Facility Address: 1260 Security Rd	Street	
Facility Address: <u>Hagerstown</u> City	MD State	<b>21742</b> Zip
County: Washington		
Contact Information (Person filing rep	ort or Environmental Manager)	
Facility Telephone No.: 301-739-1150	Facility Fax No.: <u>301-</u>	739-6708
Contact Name: Victoria Mock		
Contact Title: <u>Environmental Mana</u>	ger	· · · · · · · · · · · · · · · · · · ·
Contact Address: 1260 Security Rd	Street	
Contact Address: Hagerstown	MD	21742
City Contact Email <u>victoria.mock@holci</u> t	State m.com	Zip
Contact Telephone No.: 301-739-1150	Contact Fax No.: <u>301-</u>	739-6708

For questions on how to complete this form, please call Mr. Edward Dexter, Administrator, Solid Waste Program at 410-537-3318.

Confidential Co	ommercial/Business	Information and Trade Secrets
Facility Name:	Holcim (US)	CCB Tonnage Report – 2009

B. A description of the process that generates the coal combustion byproducts, including the type of coal or other raw material that generates the coal combustion byproducts. If the space provided is insufficient, please attach additional pages:

A cement plant does not produce residue from the combustion of coal and this reporting requirement only yields theoretical values.

Holcim (US) is a <u>portland cement</u> manufacturing facility. Portland cement is a fine powder that is the basic ingredient of concrete. It is produced by combining limestone, sand, iron, and alumina plus thermal energy (coal and tires) into the kiln to obtain the product clinker, which is then combined with gypsum or other cementitious material to produce the final product, cement. Concrete (which is not our product) is comprised of cement, aggregate, water and other possible additives (possibly fly ash).

Any ash is chemically incorporated into the product matrix, clinker, through a thermal process in the kiln. Clinker is not a mixture of coal ash and raw materials. It is a unique chemically bonded material formed in a high heat atmosphere. The raw materials, sand, limestone, iron, and alumina plus thermal energy (coal and tires) are added to the kiln and the end product is clinker — not clinker and fuel residue. There is NO residue from coal.

C. The annual volume of coal combustion byproducts generated during the last calendar year, including an identification of the different types of coal combustion byproducts generated and the volume of each type generated. If the space provided is insufficient, please attach additional pages in a similar format:

<u>Table I: Volume of CCBs Generated for Previous Calendar Year:</u> Confidential Commercial/Business Information and Trade Secrets

Reporting Year	Volume of CCB Type:  No CCB is generated.  Per MDE direction, the ash content of the coal is reported	Volume of CCB Type:	Volume of CCB Type:
2009	12,172 short tons		

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Confidential Con	munancial/Dusiness Info	wastion and Tunds Co	
	_Holcim (US)	rmation and Trade Sec CCB Tonn	age Report – 2009
Additional notes:			
Commercial/Buvalues set forth multiplying the by the average This number is number indicat	usiness Information and above merely reflect volume of coal considerable percentage of ash in the being submitted at the an agreement by Hustion by-products le	et a mathematical cal sumed in the cement the coal determined the demand of MDE. lolcim (US) Inc. that	n addition, the estimated culation determined by manufacturing process d pursuant to testing.
combustion bypro	ducts or their use that w		ducted relating to the coal your company during the applicable
byproducts. Pleas nothing to test.	se attach this information	to the report. Not App	s of the coal combustion licable. There was linker in the kiln and
calendar year, ide		no residues to be dis	stion byproducts in the last posed – any residue was
than described in	Paragraph C above), the		isposed of or used (if different ne reclamation and use sites, of or used at each site:
Not Ap	plicable		
and (b) The different	ent uses by type and vol	ume of coal combustion	byproducts:
Not Ap	plicable		

If the space provided is insufficient, please attach additional pages in a similar format.  $\cdot$  (Please note that in subsequent years you need only provide the information in Section F for the last calendar year).

Form Number: MDE/WAS/PER.033 Date: February 2, 2010 TTY Users: 800-735-2258



Confidential Commercial/B Facility Name: Holcim (US	usiness Information and Trade Secrets S) CCB Tonnage Report	<b>– 2009</b>
actify Name Holenii (O.	5) CCD Tolling Report	2007
G. A description of how you 5 years, identifying:	intend to dispose of or use coal combustion byprod	lucts in the next
used, the location of intended	ame of coal combustion byproducts intended to be of disposal, mine reclamation and use sites, and the type intended to be disposed of or used at each site:	•
Not Applicable	e	
and (b) The different inten	ided uses by type and volume of coal combustion by	yproducts.
Not Applicable	2	
If the space provided is insuff	ficient, please attach additional pages in a similar fo	ormat.
report, and certify as to the ac report:	tion. An authorized official of the generator must securacy and completeness of the information contains	ned in the annual
This is to certify that, to the battached documents are true, a	est of my knowledge, the information contained in accurate, and complete:	this report and any
Signature	Denzil Cotera, Plant Manager, 301-739-1150 Name, Title, & Telephone No. (Print or Type)	2/26/2010
Nunaute	i apsizii catery/a)najeim cam	1 1274

Your Email Address

Form Number: MDE/WAS/PER.033 Date: February 2, 2010 TTY Users: 800-735-2258

